

**LAW OFFICE OF LAURA WONG-PAN PLLC**

-Attorney & Counselor at Law-

319 Mill Street  
Poughkeepsie, New York 12601

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Telephone: (845) 218-1288  
Facsimile: (845) 684-0007  
[www.laurawongpanlaw.com](http://www.laurawongpanlaw.com)

February 16, 2022

**FILED BY ECF**

Hon. Vincent L. Briccetti  
United States District Judge  
United States District Court  
300 Quarropas Street, Room 630  
White Plains, New York 10601

Re: Northrop v. Pawling Corporation and The Presray Corporation  
SDNY Civil Action No. 21-CV-04772-VB

Judge Briccetti:

The parties have reached a tentative settlement in this case and are working out the language for the non-monetary portions of the settlement agreement. We jointly request that the Court stay discovery for a period of 90 days. The reason for the delay is that we are waiting to receive a response from the U.S. Centers for Medicare and Medicare Services (CMS) about the existence and amount of any Medicare Liens, and we are unable to finalize a settlement until we have information about any liens. This process, to my understanding, can take several months.

Thank you for your consideration.

Respectfully,

/s/ *Laura Wong-Pan*

Laura Wong-Pan

cc: Michael Abitabilo, Esq.